

JUDGE STANTON

*[Handwritten signature]*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**12 CIV 7142**

TiVo, Inc.,

Petitioner,

v.

Dorothy Goldwasser, Romi Jones née Goldwasser,  
and Good Inventions, LLC,

Respondents.

Civil Action No.

**DECLARATION OF  
SHAUN SNADER IN SUPPORT OF  
TIVO INC.'S PETITION TO VACATE  
ARBITRATION AWARD**

FILED  
U.S. DISTRICT COURT  
S.D. N.Y.  
12 SEP 24 PM 1:18

**DECLARATION OF SHAUN SNADER  
IN SUPPORT OF TIVO INC.'S PETITION TO VACATE ARBITRATION AWARD**

I, Shaun Snader, declare as follows:

1. I am an attorney at the law firm of Wilson Sonsini Goodrich & Rosati, P.C. ("WSGR"), counsel to TiVo Inc. ("TiVo") in the above captioned action. I submit this declaration in support of the Petitioner TiVo Inc.'s accompanying Motion to Vacate ("Motion"). I have personal knowledge of the facts contained within this declaration and if called as a witness, could testify competently to the matters contained therein.

2. Attached hereto as Exhibit A is a true and correct copy of the Patent License Agreement dated March 12, 2004 between TiVo Inc. and Good Inventions LLC, Eric Goldwasser and Romi Goldwasser. [FILED UNDER SEAL]

3. Attached hereto as Exhibit B is a true and correct copy of a letter from Tobey Marzouk to Matthew Zinn dated June 23, 2011. [FILED UNDER SEAL]

4. Attached hereto as Exhibit C is a true and correct copy of Dorothy Goldwasser, Romi Jones née Goldwasser, and Good Inventions, LLCs' Demand for Arbitration dated August 19, 2011 filed with the American Arbitration Association. [FILED UNDER SEAL]

5. Attached hereto as Exhibit D is a true and correct copy of TiVo, Inc.'s Answering Statement to the Demand for Arbitration dated October 12, 2011 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

6. Attached hereto as Exhibit E is a true and correct copy of a letter dated March 19, 2012 from Michael B. Levin to Members of the American Arbitration Association ("AAA") Tribunal Philip D. O'Neill, Elizabeth Gilbert, and Abigail Pessen seeking leave to file a motion for summary disposition. [FILED UNDER SEAL]

7. Attached hereto as Exhibit F is a true and correct copy of a letter dated March 23, 2012 from Tobey B. Marzouk to Members of the AAA Tribunal Philip D. O'Neill, Elizabeth Gilbert, and Abigail Pessen. [FILED UNDER SEAL]

8. Attached hereto as Exhibit G is a true and correct copy of "Claimants' Posthearing Brief" dated June 25, 2012 2011 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. The version attached is a redacted version. That redacted information was third party confidential information that is relevant only to the calculation of potential damages and not relevant to the Petition to Vacate. [FILED UNDER SEAL]

9. Attached hereto as Exhibit H is a true and correct copy of "TiVo Inc.'s Post-Hearing Brief" dated June 25, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. The version attached is a redacted version. That redacted information was third party confidential information that is relevant only to the calculation of potential damages and not relevant to the Petition to Vacate. [FILED UNDER SEAL]

10. Attached hereto as Exhibit I is a true and correct copy of "Claimants' Posthearing Reply Brief" dated July 6, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

11. Attached hereto as Exhibit J is a true and correct copy of "TiVo Inc.'s Post-Hearing Reply Brief" dated July 6, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. The version attached is a redacted version. That redacted information

was third party confidential information that is relevant only to the calculation of potential damages and not relevant to the Petition to Vacate. [FILED UNDER SEAL]

12. Attached hereto as Exhibit K is a true and correct copy of “TiVo Inc.’s Post-Hearing Sur-Reply Brief” dated July 10, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

13. Attached hereto as Exhibit L is a true and correct copy of “Claimants’ Response to TiVo’s Sur-Reply Brief” dated July 11, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

14. Attached hereto as Exhibit M is a true and correct copy of an email from Philip O’Neill to Shaun Snader and Tobey Marzouk dated July 12, 2012. [FILED UNDER SEAL]

15. Attached hereto as Exhibit N is a true and correct copy of “Claimants’ Supplementary Brief Requested by Panel” dated July 30, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

16. Attached hereto as Exhibit O is a true and correct copy of “TiVo Inc.’s Response to the Panel’s Questions” dated July 30, 2012 filed with the American Arbitration Association in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

17. Attached hereto as Exhibit P is a true and correct copy of “Dissent from Final Award” dated August 21, 2012 signed by Tribunal Member Philip D. O’Neill in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

18. Attached hereto as Exhibit Q is a true and correct copy of “Final Award of Arbitrators” dated August 22, 2012 signed by Tribunal Members Elizabeth Gilbert and Abigail Pessen in Case No. 13 117 Y 02109 11. [FILED UNDER SEAL]

19. Attached hereto as Exhibit R is a true and correct copy of “Non-Disclosure Agreement” dated October 6, 2003 between TiVo Inc. and Eric and Romi Goldwasser.

20. Attached hereto as Exhibit S is a true and correct copy of “Claimants’ Prehearing Brief” dated May 21, 2011 [sic]. The version attached is a redacted version. That redacted


information was third party confidential information that is relevant only to the calculation of potential damages and not relevant to the Petition to Vacate. [FILED UNDER SEAL]

21. Attached hereto as Exhibit T is a true and correct copy of TiVo Inc.'s Pre-hearing Brief dated May 21, 2012. [FILED UNDER SEAL]

22. Attached hereto as Exhibit U is a true and correct copy of "Stipulated Protective Order and Agreement" dated January 27, 2012 entered Order No. 3 AAA Arbitration No. 13 117 Y 0210911.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of September, 2012 in Washington, D.C.



Shaun Snader